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12 Attorneys for Defendant
13 TWININGS NORTH AMERICA, INC.

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

NANCY LANOVAZ, on behalf of herself and
all others similarly situated,

Case No. CV12-02646-RMW

Plaintiff,

CLASS ACTION

v.

**JOINT LITIGATION
SCHEDULE AND [] ORDER**

TWININGS NORTH AMERICA, INC.,

Judge: Hon. Ronald M. Whyte
Action Filed: May 23, 2012

Defendant.

1 The parties, Nancy Lanovaz (“Plaintiff”) and Twinings North America, Inc. (“Twinings”)
2 or “Defendant”) submit this Joint Proposed Litigation Schedule pursuant to this Court’s May 10,
3 2013 docket entry. (Dkt. 57.)

4 **1) LITIGATION SCHEDULE**

5 The parties jointly propose the following litigation schedule:

6 **Deadline to Exchange Initial Disclosures:** June 10, 2013

7 **Plaintiff’s Motion for Class Certification:** November 15, 2013

8 **Defendant’s Opposition:** February 14, 2014

9 **Plaintiff’s Reply:** March 14, 2014

10 **Hearing on Class Certification:** April 11, 2014

11 The parties will begin the discovery process immediately. Defendant intends to file an
12 early motion for summary judgment focused on Ms. Lanovaz in her individual capacity on or
13 before April 11, 2014.

14 **2) SETTLEMENT AND ADR**

15 The parties have agreed to mediation, and the Court has ordered that it occur within 90
16 days of the ruling on Defendant’s Motion to Dismiss the First Amended Complaint. (Dkt. 28.)

17 The parties have conducted two phone conferences with the Court’s ADR representative, and all
18 parties concluded that, in light of the Motion to Dismiss the Second Amended Complaint, the
19 mediation should occur within 90 days of the ruling on this motion, rather than the prior motion.

20 The parties respectfully request that the Court agree to this extension.

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1 Dated: May 24, 2013

BEN F. PIERCE GORE
PRATT & ASSOCIATES

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By: /s/ Ben F. Pierce Gore
Ben F. Pierce Gore

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Attorneys for Plaintiff
NANCY LANOVAZ

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Dated: May 24, 2013

WILLIAM L. STERN
CLAUDIA M. VETESI
LISA A. WONGCHENKO
MORRISON & FOERSTER LLP

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By: /s/ William L. Stern
William L. Stern

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Attorneys for Defendant
TWININGS NORTH AMERICA, INC.

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ECF ATTESTATION

I, William L. Stern, am the ECF User whose ID and password are being used to file the following: **JOINT PROPOSED LITIGATION SCHEDULE**. In compliance with General Order 45, X.B., I hereby attest that Ben F. Pierce Gore has concurred in this filing.

6 || Dated: May 24, 2013

WILLIAM L. STERN
CLAUDIA M. VETESI
LISA A. WONGCHENKO
MORRISON & FOERSTER LLP

By: /s/ William L. Stern
WILLIAM L. STERN

[] ORDER

PURSUANT TO THE PARTIES PROPOSAL, IT IS SO ORDERED.

DATED: _____

Ronald M. Whyte

RONALD M. WHYTE
United States District Judge